

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

E.I. DU PONT DE NEMOURS AND)
COMPANY,)
Plaintiff,)
v.) No. 3-07-0949
AMERICAN NONWOVENS) Judge William J. Haynes
CORPORATION,)
Defendant.) JURY DEMAND

*Order
Motion
is pending
will do
NSA
2-29-08*

JOINT MOTION FOR PROPOSED REVISION TO SCHEDULING ORDER

Plaintiff E.I. du Pont de Nemours and Company and Defendant American Nonwovens Corporation (hereinafter "the Parties") file this Joint Motion for Proposed Revision to Scheduling Order.

The Parties request an extension of the March 3, April 1 and May 1, 2008 expert deadlines outlined in Case Management Order No. 1 to allow for additional time for discovery. The parties are making efforts toward settlement and the proposed deadlines will not impact the discovery deadline, dispositive motion deadline or trial date.

In addition, because ANC has asserted a counterclaim, the current schedule of the expert disclosures could prove problematic. As currently written, Plaintiff is required to identify its experts (both affirmative and responsive) before Defendant identifies any of its experts. Thus, in addition to extending the expert disclosure deadlines, the Parties also propose revising the language in the expert disclosure deadlines to provide for initial expert disclosures by the "party